

AMENDMENTS TO THE DRAWINGS

Please amend Figure 1 as shown in the attached replacement sheet. Specifically, Figure 1 has been amended to delete the boxes labeled “Open Digital Marketplaces/Applications” (40), “Operating System” (30), and “Network & Systems Infrastructure” (32), and remove the reference numbers for the other labels that are not discussed in the Specification. In addition, Figure 1 has been amended to include reference numeral 28 under the label “Internet Service Deployment Platform.” Applicant asserts that no new subject matter is added by way of these amendments.

REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for courtesies extended during the Examiner Interview of January 6, 2006.

Disposition of Claims

Claims 1-11 and 13 are currently pending in this application. Claims 1, 6, and 13 are independent. The remaining claims depend, directly or indirectly, from claims 1 and 6.

Drawings

Figure 1 is objected to for lack of unity. In accordance with the Examiner's suggestions, Figure 1 has been amended to delete the boxes labeled "Open Digital Marketplaces/Applications" (40), "Operating System" (30), and "Network & Systems Infrastructure" (32). Reference numerals not appearing in the Specification have also been deleted in amended Figure 1. In addition, Figure 1 has been amended to include reference numeral 28 under the label "Internet Service Deployment Platform." No new subject matter is added by way of these amendments. Accordingly withdrawal of this objection and acceptance of the drawings is respectfully requested.

Claim Amendments

Independent claims 1, 6, and 13 of the present invention have been amended to include the word "directory" before "entries" to specify that a minimal set of *directory* entries are determined to synchronize the consumer and supplier servers. As discussed during the Examiner Interview conducted on January 6, 2006, directory entries are specific pieces of information well known in the art that are associated with directory servers. Support for this amendment may be

found, for example, in Figure 2 and the accompanying text on pages 4-5 of the Specification. Further, as discussed with the Examiner during the Examiner Interview of January 6, 2006, independent claims 1, 6, and 13 have been amended to specify that a directory information tree is a hierarchical structure that stores configuration information associated with the directory server. Support for this amendment may be found, for example, on page 9, paragraph [0028] of the Specification.

Rejection(s) under 35 U.S.C. § 103

Claims 1, 2, and 4 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over “The LDUP Replication Update Protocol” (“Stokes”), U.S. Patent No. 6,272,536 (“van Hoff”) and U.S. Patent No. 6,074,434 (“Cole”). To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

The claimed invention relates to updating entries in a directory information tree for each server in order to synchronize the directory information trees between two servers (*i.e.*, a consumer server and a supplier server). Specifically, the claimed invention is directed towards updating directory entries in directory servers, where entries correspond to textual and/or numerical information (*i.e.*, names, addresses, phone numbers, etc.) (*See* Specification, paragraph [0004]). Thus, the amended claims require, in part, that the replica update vector comprise a minimal set of *directory* entries to synchronize the consumer and supplier servers.

Turning to the rejection, to establish a *prima facie* case of obviousness “...the prior art reference (or references when combined) must teach or suggest all the claim limitations.” (*See* MPEP §2143.03). Further, “all words in a claim must be considered in judging the patentability of that claim against the prior art.” (*See* MPEP §2143.03). The Applicant respectfully asserts

that the references, when combined, fail to teach or suggest all the claim limitations of amended independent claim 1.

Specifically, the Examiner has admitted that Stokes fails to teach the use of pluggable services, directory trees, performing comparisons, and the determining of a minimal set of directory entries. (*see* Office Action mailed December 2, 2005, p. 3). However, the Examiner relies on van Hoff to teach a directory information tree (DIT). Applicant respectfully disagrees. van Hoff discloses a system and method for distributing software applications and data to many thousands of clients over a network (*i.e.*, distributing code and data to clients) (*see* van Hoff, Abstract). The cited portion of van Hoff (*i.e.*, col. 9, ll. 56-58) fails to disclose or suggest anything related to a directory information tree or any type of hierarchical structure. Further, although the remainder of van Hoff does disclose a file and/or directory that are represented as nodes of a hierarchical tree structure, none of van Hoff discloses or suggests a directory information tree configured to store configuration information associated with a directory server. Rather, van Hoff only discloses a hierarchical tree structure associated with a channel index and channel data (*see* van Hoff, Figure 2 and accompanying text).

Further, the Examiner relies on Cole to disclose the determination of a minimal set of directory entries necessary to synchronize the consumer and supplier servers. However, as discussed with the Examiner during the Examiner Interview conducted on January 6, 2006, Cole relates only to updating *code*, and is completely silent with respect to determining a minimal set of *directory* entries. Particularly, Cole discloses that a server selects code updates to download to a client computer when the client computer has a version other than the current version of the consistent code updates (*see* Cole, Abstract). Cole explicitly discloses that code updates are updates which are necessary for the client to ensure compatibility between programs within the

client and fix significant “bugs” in a program within the client (*see* Cole, col. 6, ll. 61-65). An example of this type of code update is shown at the bottom of column 4 in Cole. Code updates comprise updates to device drivers, BIOS levels, etc., and are completely unrelated to *entries of a directory server*, as shown in Figure 4 of the present invention.

In addition, Cole fails to disclose or suggest updating code for the purpose of synchronizing two servers. The independent claims clearly recite that a minimal set of directory entries are determined *in order to synchronize* the directory entries between two servers. In Cole, one server updates code on a client computer relative to the current version of code running on the system. The client computer is not updated to synchronize the client computer with anything else. In other words, two entities are not matched by the code updates determined in Cole. While the Examiner relies on Stokes to disclose synchronization between the consumer server and the supplier server, the Examiner admits that Stokes fails to disclose determining a minimal set of directory entries. Therefore, it is not proper for the Examiner to assert that Stokes discloses determining of a minimal set of directory entries *for the purpose of synchronizing* two servers, as recited in the independent claims.

In view of the above, it is clear that Stokes, van Hoff, and Cole, whether considered separately or in combination, fail to render amended independent claim 1 obvious. Thus, amended independent claim 1 is patentable over Stokes, van Hoff and Cole. Dependent claims 2 and 4, which depend directly from claim 1, are patentable for at least the same reasons. Accordingly withdrawal of this rejection is respectfully requested.

Claim 3 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Stokes, van Hoff, Cole and further in view of U.S. Patent No. 6,353,834 (“Wong”). To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

As described above, none of Stokes, van Hoff, and Cole render amended independent claim 1 obvious. Further, Wong fails to supply that which Stokes, van Hoff, and Cole lack, as evidenced by the fact that the Examiner relies on Wong solely for the purpose of disclosing a change sequence number pending list (*see* Office Action mailed December 2, 2005, page 6). Thus, amended independent claim 1 is patentable over Stokes, van Hoff, Cole, and Wong, whether considered separately or in combination. Dependent claim 3, which depends directly from claim 1, is patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 5 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Stokes, van Hoff, Cole, and further in view of U.S. Patent No. 6,393,434 ("Huang"). To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

As described above, none of Stokes, van Hoff, and Cole render amended independent claim 1 obvious. Further, Huang fails to supply that which Stokes, van Hoff, and Cole lack, as evidenced by the fact that the Examiner relies on Huang solely for the purpose of disclosing accessing the RUV through an application programming interface (*see* Office Action mailed December 2, 2005, page 7). Thus, amended independent claim 1 is patentable over Stokes, van Hoff, Cole, and Huang, whether considered separately or in combination. Dependent claim 5, which depends directly from claim 1, is patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 6-8, 10, 12, and 13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Stokes, U.S Patent No. 6,539,381 ("Prasad"), and Cole. Claim 12 has been canceled by a previous reply. Accordingly, Applicant believes the Examiner inadvertently included claim 12 in the rejection on page 8 of the Office Action mailed December 2, 2005. For the purposes of

this response, Applicant assumes that claim 12 is not included in the rejection above. To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

The Examiner admits that Stokes and Prasad fail to disclose or suggest determining a minimal set of directory entries (*see* Office Action mailed December 2, 2005, pages 9 and 10). The Examiner relies on Cole to disclose this limitation of amended independent claims 6 and 13. As described above, Cole fails to disclose or suggest determining a minimal set of *directory* entries to synchronize the consumer and supplier servers. Independent claims 6 and 13 have been amended to include similar allowable subject matter. Thus, it follows that amended independent claims 6 and 13 are patentable over Stokes, Prasad, and Cole, whether considered separately or in combination. Dependent claims 7, 8, and 10, which depend directly from claim 6, are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claim 9 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Stokes, Prasad, Cole, and further in view of Wong. To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

As described above, none of Stokes, Prasad, and Cole disclose or suggest the limitations of amended independent claim 6. Further, Wong fails to provide that which Stokes, Prasad, and Cole lack, as evidenced by the fact that the Examiner relies on Wong solely for the purpose of disclosing the use of a change sequence number pending list (*see* Office Action mailed December 2, 2005, page 11). Thus, it is clear that amended independent claim 6 is patentable over Stokes, Prasad, Cole, and Wong, whether considered separately or in combination.

Dependent claim 9, which depends directly from claim 6, is patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claim 11 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Stokes, Prasad, Cole, and further in view of Huang. To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

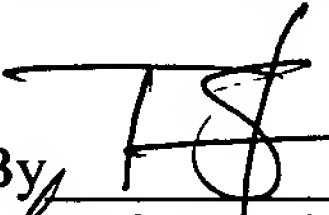
As described above, none of Stokes, Prasad and Cole disclose or suggest the limitations of amended independent claim 6. Further, Huang fails to supply that which Stokes, Prasad, and Cole lack, as evidenced by the fact that the Examiner relies on Huang solely for the purpose of disclosing that a RUV is accessed through an application programming interface (see Office Action mailed December 2, 2005, page 13). Thus, it is clear that independent claim 6 is patentable over Stokes, Prasad, Cole, and Huang, whether considered separately or in combination. Dependent claim 11, which depends directly from claim 6, is patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 13220/013001).

Dated: February 2, 2006

Respectfully submitted,

By  #45,079
Robert P. Lord THOMAS SCHLISER
Registration No.: 46,479
OSHA · LIANG LLP
1221 McKinney St., Suite 2800
Houston, Texas 77010
(713) 228-8600
(713) 228-8778 (Fax)
Attorney for Applicant